



**Modrall Sperling
Roehl Harris & Sisk, P.A.**

Post Office Box 2168
Albuquerque, NM 87103-2168
Tel: 505.848.1800
Federal Identification No.: 85-0283491

www.modrall.com

Date: February 28, 2020
To: Scott Spencer, Senior Resolution Manager
Gallagher Bassett
PO Box 2934
Clinton, IA 52733-2934
Re: BJ's Restaurant / Linda Henderson

Invoice Number: 259968
Client Number: 10299
Matter Number: 0001
Claim Number: 004113-010586-GB-01

For Professional Services Rendered Through: December 31, 2019

EXHIBIT A

<u>Date</u>	<u>Professional</u>	<u>Task</u>	<u>Activity</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
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10299.0001

BJ's Restaurant Operations Company
BJ's Restaurant / Linda HendersonInvoice # 259968
February 28, 2020
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This Invoice is for the Period Ending: December 31, 2019

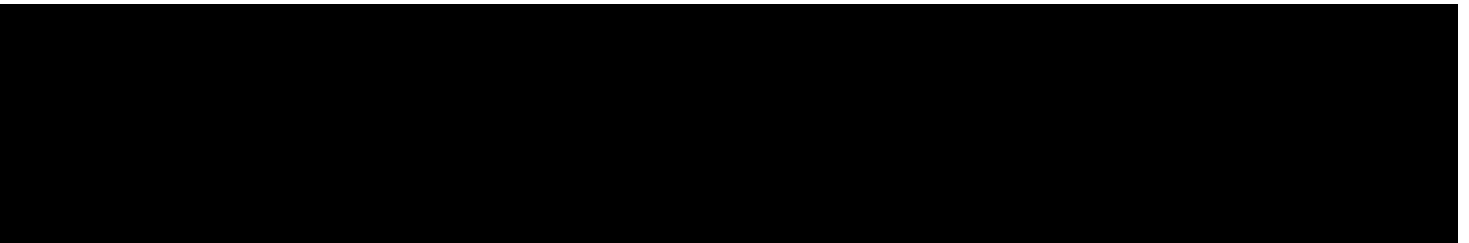
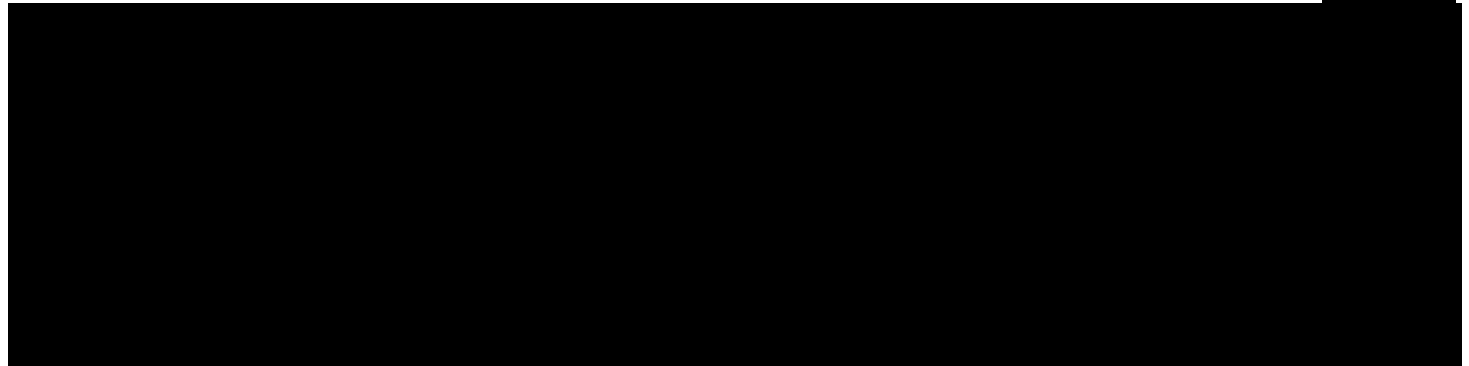
<u>Date</u>	<u>Professional</u>	<u>Task</u>	<u>Activity</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/26/19	L. Hough	L120	A104	Evaluate arguments in Plaintiff's Motion to Remand.	0.40	74.00
12/03/19	L. Hough	L120	A104	Evaluate Plaintiff's Motion to Remand and begin draft Response to Plaintiff's Motion to Remand.	1.90	351.50
12/04/19	L. Hough	L210	A103	Draft Affidavit and continue drafting Response to Motion to Remand.	4.00	740.00
12/05/19	L. Hough	L210	A103	Finish drafting Response to Motion to Remand; perform technical edit on Response to improve readability and citations.	2.80	518.00
12/05/19	L. Hough	L210	A103	Draft and revise Declaration of Debbie Nichols.	0.20	37.00
12/05/19	L. Hough	L120	A103	Work to outline key arguments to develop in Response to Motion to Remand.	0.20	37.00
12/05/19	L. Hough	L120	A104	Analyze basis to pursue Rule 11 Sanctions.	0.20	37.00
12/06/19	L. Hough	L210	A103	Revise Response to Motion to Remand to clarify locations in NM and details of headquarter operations, and conduct subsequent technical edit to remove any inconsistencies and improve persuasiveness.	2.20	407.00
12/06/19	L. Hough	L120	A104	Evaluate Fed. R. Civ. P. 11 and outline possible legal arguments for sanctions.	0.60	111.00
12/09/19	L. Hough	L110	A102	Motion for Rule 11 Sanctions: research federal case law to support arguments for sanctions.	2.60	481.00
12/09/19	L. Hough	L120	A103	Motion for Rule 11 Sanctions: draft legal standards and legal argument sections.	2.50	462.50

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<u>Date</u>	<u>Professional</u>	<u>Task</u>	<u>Activity</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/10/19	L. Hough	L120	A104	Further evaluate Complaint, Notice of Removal, and Motion for Remand to development factual basis for Motion for Rule 11 Sanctions.	1.10	203.50
12/11/19	N. Nieman	L210	A103	Revise Motion for Sanctions and letter regarding the same.	0.80	208.00
12/11/19	L. Hough	L210	A103	Motion for Rule 11 Sanctions: draft factual and procedural background section, and factual application to legal arguments.	1.70	314.50
12/11/19	L. Hough	L210	A103	Motion for Rule 11 Sanction: draft introduction and conclusion sections, and review and revise complete motion to improve persuasiveness and develop arguments.	2.40	444.00
12/12/19	L. Hough	L210	A103	Conduct final edit and finalize Motion for Sanctions and Letter regarding Motion for Sanctions, and draft email to opposing counsel regarding said documents.	0.90	166.50
12/12/19	L. Hough	L110	A102	Research federal and local rules to confirm all requirements that must be met before we can file a Motion for Rule 11 Sanctions.	0.20	37.00

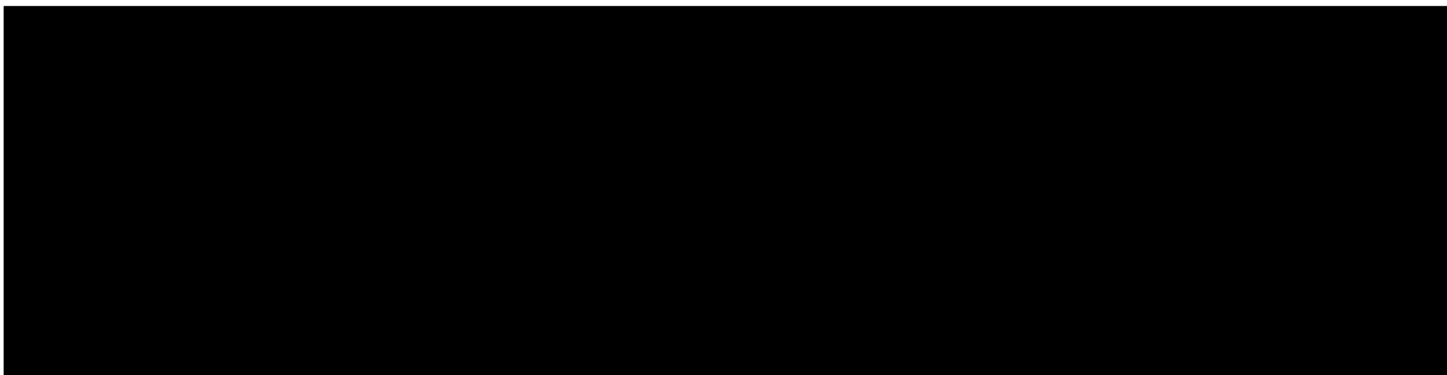
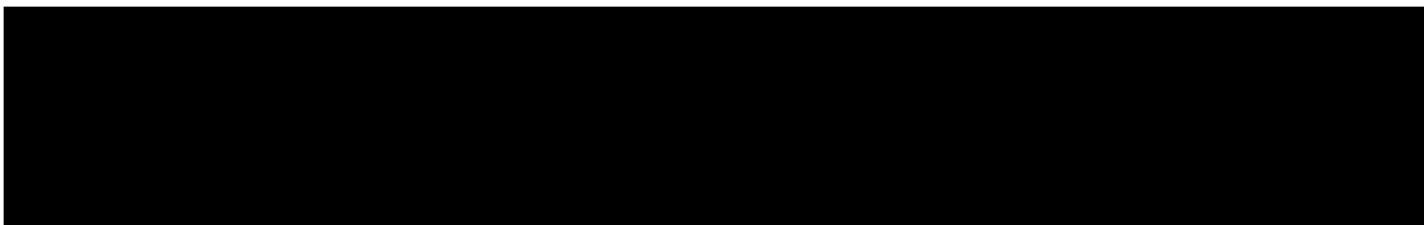
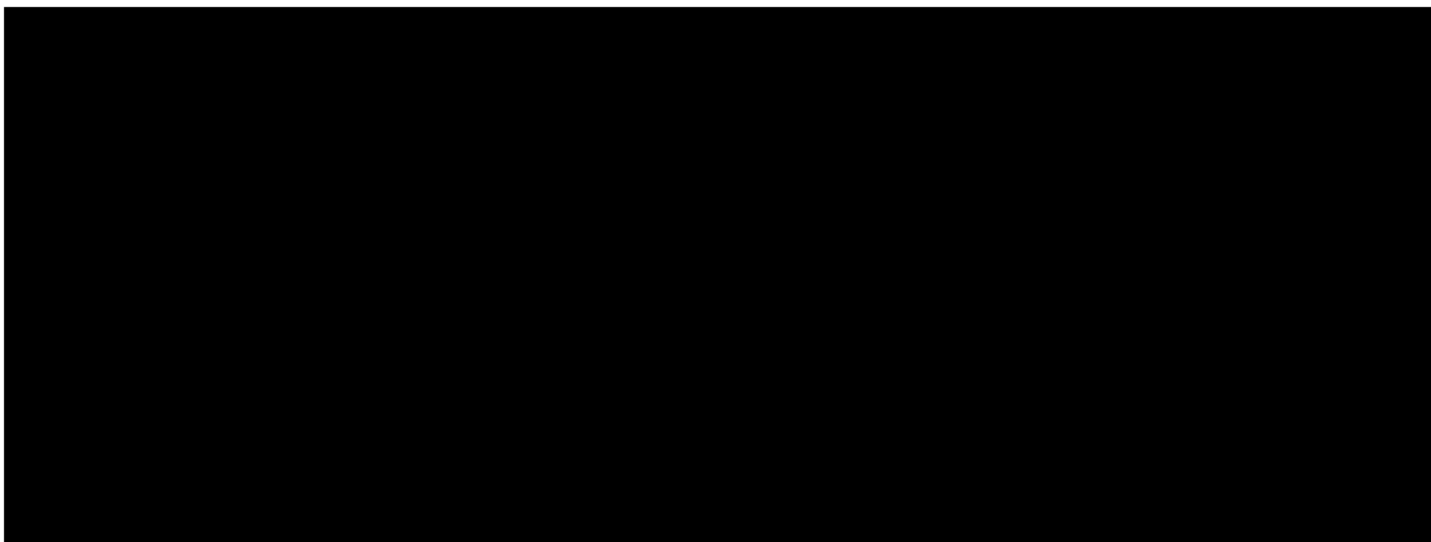
TOTAL SERVICES**\$**

10299.0001

BJ's Restaurant Operations Company
BJ's Restaurant / Linda Henderson

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MODRALL SPERLING

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PO Box 2934
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Re: BJ's Restaurant / Linda Henderson

Invoice Number: 259968
Client Number: 10299
Matter Number: 0001

For Professional Services Rendered Through: December 31, 2019

Matter	Description	Invoice #	Services	Disbursements	Tax	Total
10299.0001	BJ's Restaurant / Linda Henderson	259968				

PAY THIS AMOUNT

REMITTANCE

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This invoice is payable in full upon receipt.



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Date: February 28, 2020
To: Scott Spencer, Senior Resolution Manager
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PO Box 2934
Clinton, IA 52733-2934
Re: BJ's Restaurant / Linda Henderson

Invoice Number: 260768
Client Number: 10299
Matter Number: 0001
Claim Number: 004113-010586-GB-01

For Professional Services Rendered Through: January 31, 2020

ACCOUNT SUMMARY FOR THIS MATTER

[REDACTED]

Itemization of Services Attached	\$1,174.00
Total Taxable Disbursements	\$1.10
Total Non-taxable Disbursements	\$0.00
Gross Receipts Tax	\$92.54
Total Current Charges	\$1,267.64

[REDACTED]

10299.0001

BJ's Restaurant Operations Company
BJ's Restaurant / Linda HendersonInvoice # 260768
February 28, 2020
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This Invoice is for the Period Ending: January 31, 2020

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Professional</u>	<u>Task</u>	<u>Activity</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/03/20	N. Nieman	L120	A101	Analyze notice issue in relation to Plaintiff's claim.	0.70 \$	182.00
01/07/20	L. Hough	L350	A103	Revise Motion for Sanctions to include reference to communications with opposing counsel regarding withdrawal of motion for remand, and create and finalize exhibits A through C.	0.30	55.50
01/23/20	L. Hough	L350	A104	Briefly evaluate key arguments made in Plaintiff's Response to Motion for Sanctions and briefly outline key arguments to raise in Reply.	0.20	37.00
01/31/20	N. Nieman	L350	A103	Work on strategy for outlining key arguments in support of Motion for Sanctions.	0.40	104.00
01/31/20	L. Hough	L350	A103	Evaluate Response to Motion for Rule 11 Sanctions and Draft Reply ISO Motion for Sanctions.	4.30	795.50
TOTAL SERVICES					\$	1,174.00

TIMEKEEPER SUMMARY

<u>Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Nieman, N.	Shareholder	260.00	1.10	286.00
Hough, L.	Associate	185.00	4.80 \$	888.00
TOTAL SERVICES			5.90 \$	1,174.00

DISBURSEMENTS**Taxable Disbursements**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/24/20	VENDOR: Chase - Karen F.; INVOICE#: 012420; DATE: 1/24/2020 - Pacer Service 12/6/2019 - LDH	\$ 1.10
Taxable Subtotal		\$ 1.10

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This Invoice is for the Period Ending: January 31, 2020

Non-Taxable Disbursements

Non-Taxable Subtotal	\$	0.00
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TOTAL DISBURSEMENTS	\$	1.10
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COST SUMMARY

<u>Cost Code</u>	<u>Task Description</u>	<u>Amount</u>
PACER	PACER Search	1.10
	TOTAL	\$1.10

TASK SUMMARY

<u>Task</u>	<u>Activity</u>	<u>Description</u>	<u>Hours</u>		<u>Amount</u>
L120	A101	Analysis/Strategy	0.70	\$	182.00
L350	A103	Discovery Motions	5.20		992.00
		TOTAL SERVICES	5.90	\$	1,174.00



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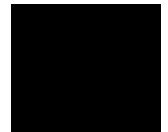
Invoice Number: 260768
Client Number: 10299
Matter Number: 0001

For Professional Services Rendered Through: January 31, 2020

Matter	Description	Invoice #	Services	Disbursements	Tax	Total
10299.0001	BJ's Restaurant / Linda Henderson	260768	\$1,174.00	\$1.10	\$92.54	\$1,267.64

Plus Previous Balance

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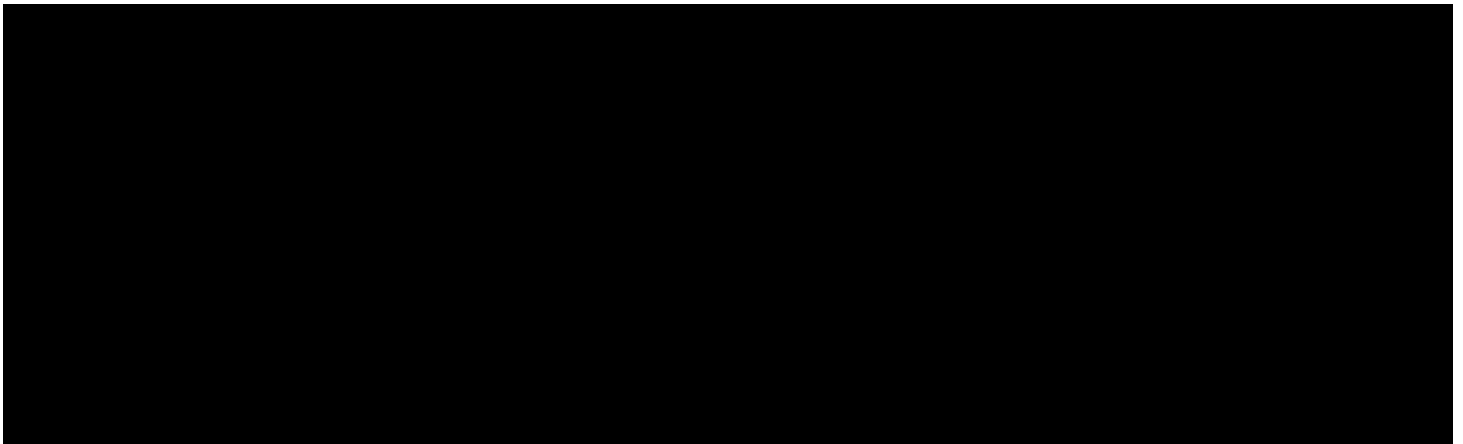
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Date: March 26, 2020
To: Scott Spencer, Senior Resolution Manager
Gallagher Bassett
PO Box 2934
Clinton, IA 52733-2934
Re: BJ's Restaurant / Linda Henderson

Invoice Number: 261644
Client Number: 10299
Matter Number: 0001
Claim Number: 004113-010586-GB-01

For Professional Services Rendered Through: February 29, 2020

ACCOUNT SUMMARY FOR THIS MATTER



10299.0001

BJ's Restaurant Operations Company
BJ's Restaurant / Linda HendersonInvoice # 261644
March 26, 2020
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This Invoice is for the Period Ending: February 29, 2020

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Professional</u>	<u>Task</u>	<u>Activity</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/04/20	N. Nieman	L210	A103	Revise Reply in Support of Motion for Sanctions.	1.20 \$	312.00
02/05/20	N. Nieman	L120	A104	Analyze final Reply ISO Sanctions against Plaintiff's counsel.	0.30	78.00
02/05/20	L. Hough	L210	A103	Incorporate revisions to Motion for Rule 11 Sanctions, incorporate additional case law and update citations, and conduct technical review and edit.	0.80	148.00

TOTAL SERVICES

\$



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Date: March 26, 2020
To: Scott Spencer, Senior Resolution Manager
Gallagher Bassett
PO Box 2934
Clinton, IA 52733-2934
Re: BJ's Restaurant / Linda Henderson

Invoice Number: 261644
Client Number: 10299
Matter Number: 0001

For Professional Services Rendered Through: February 29, 2020

Matter	Description	Invoice #	Services	Disbursements	Tax	Total
10299.0001	BJ's Restaurant / Linda Henderson	261644				

Plus Previous Balance

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